

Didn't do App A, C, E, G, left out most NCore or PM10-2.5 (req only at NCore) requirements – can add later for completeness

ANNUAL AIR MONITORING NETWORK PLAN CHECKLIST

Blue = fields that would be filled in during ANP review

ANP requirement	Citation within 40 CFR 58	Was the info submitted? If yes, page #s	Action if info is missing or incorrect	Does it meet the req?	Action if req. is not met (assumes correct info submitted)	Notes (for now on req. but ultimately for review notes)	Informs network adeq?	Critical for ANP app? ¹
July 1 st due date	58.10 (a)(1)		Request plan be submitted ASAP.		ANP approval can happen within 120 days of when delinquent plan is received	shall submit	N	N
Statement of purpose for each monitor	58.10 (a)(1)		Add/correct in following year's plan	Yes if correct info was submitted	No impact on current year's approval	Shall include	N	Y
30-day public comment / inspection period ²	58.10 (a)(1), 58.10 (a)(2)		Put out for comment and resubmit		EPA provide comment period	Shall/must provide	N	Y
List of modifications to SLAMS network	58.10 (a)(2)		Add/correct in following year's plan and withhold	Yes if correct info was submitted, (assumes we are not	N/A – req. met if correct info submitted	Subject to approval by RA	N	Y

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Comment [m1]: Create cheat-sheet for requirement plus non-blue columns.

Comment [m2]: Create process to request plan or letter of no changes?

¹ Identify critical criteria for approval. All else is WOE.

Critical is based on:

- 40 CFR 58.10 says “must include” or “shall provide”
- 40 CFR 58, App A – pick the critical ones and all else WOE
- 40 CFR 58, App C – ID as critical if requirement is “must”
- 40 CFR 58, App D – ID as critical if requirement is “must”

- 40 CFR 58, App E – none are critical since these need to be followed “to the extent possible”

² Comment period required by either EPA or S/L/T agency if modifications are proposed to the SLAMS network. Otherwise an inspection period is required by the S/L/T agency.

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			approval of that portion	approving the changes in ANP)				
NCore plan submitted to Admin. by 7/1/2009	58.10 (a)(3)		Ask for plan ASAP	N/A – HQ app.	N/A – HQ app.	Shall HQ app.	N	N
NCore site operational by 1/1/2011	58.10 (a)(3)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for ... HQ app.	N	Y
Pb plan for ≥1.0 tpy sources by 7/1/2009	58.10 (a)(4)		Ask for (correct) plan ASAP and withhold approval of that portion		If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y
Pb site for ≥1.0 tpy sources operational by 1/1/2010	58.10 (a)(4)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for ...	Y	Y
Pb plan for 0.5-1.0 tpy by 7/1/2011	58.10 (a)(4)		Ask for plan ASAP		If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y
Pb site for 0.5-1.0 tpy sources operational by	58.10 (a)(4)		Add/correct in following		Withhold approval of that portion	Plan shall provide for ...	Y	Y

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12/27/2011			year's plan and withhold approval of that portion					
NO2 plan for area-wide and RA40 sites by 7/1/2012	58.10 (a)(5)		Ask for plan ASAP		2012: Withhold approval of that portion since HQ app.	Shall HQ app.	N	N
NO2 area-wide and RA40 sites operational by 1/1/2013	58.10 (a)(5)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for ...	Y	Y
NO2 plan for near-road sites by ?	58.10 (a)(5)		Ask for plan ASAP		2012: Withhold approval of that portion since HQ app.	Shall HQ app.	N	N
NO2 near-road sites operational by ?	58.10 (a)(5)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion ?	Plan shall provide for ...	Y	Y
SO2 plan for PWEI sites by 2011	58.10 (a)(6)		Ask for plan ASAP		If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y
SO2 sites operational	58.10 (a)(6)		Add/correct		Withhold approval	Plan shall	Y	Y

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by 1/1/2013	and 58.13(d)		in following year's plan and withhold approval of that portion		of that portion	provide for...		
CO plan for near-road sites by 2014	58.10 (a)(7)		Ask for plan ASAP		If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y
CO sites operational by 1/1/2016	58.10 (a)(?)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for...	Y	Y
AQS site identification number for each site	58.10 (b)(1)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y
Location of each site: street address and geographic coordinates	58.10 (b)(2)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y
Sampling and analysis	58.10 (b)(3)		Add/correct		N/A – req. met if	Must contain	N	Y

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Comment [g3]: Should the 58.10 stuff be combined with the App. D 1.1 stuff? (Like, all the stuff they might have in the individual site tables could be grouped together in this checklist?)

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method(s) for each measured parameter			in following year's plan and withhold approval of that portion		correct info submitted	following information		
Operating schedule for each monitor	58.10 (b)(4)		Add/correct in following year's plan and withhold approval of that portion		If operating schedule does not meet req: withhold approval of that portion (can be monitor specific)	Must contain following information	Y	Y
Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted, (assumes we are not approving the changes in ANP)	N/A – req. met if correct info submitted	Must contain following information	N	Y
Monitoring objectives ³ for each monitor as defined in Appendix D	58.10(b)(6); App. D		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y
Scale of representativeness for			Add/correct in following		N/A – req. met if correct info	Must contain following	Y	Y

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³ Site type is considered later.

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each monitor as defined in Appendix D			year's plan and withhold approval of that portion		submitted	information		
Identification of sites suitable and sites not suitable for comparison to the annual PM2.5 NAAQS as described in Part 58.30	58.10 (b)(7)		Add/correct in following year's plan and withhold approval of that portion		N/A – req. met if correct info submitted	Must contain following information	Y	Y
MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y
The designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	Y	Y
Any source-oriented Pb site for which a waiver has been granted by EPA RA	58.10 (b)(10)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	Y	Y

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Any Pb monitor for which a waiver has been requested or granted by EPA RA for us of Pb-PM10 in lieu of Pb-TSP	58.10 (b)(11)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	Y	Y
Identification of required NO2 monitors as either near-road or area-wide	58.10 (b)(12)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion? (HQ)	Must contain following information	Y	Y
Document how states and local agencies provide for the review of changes to a PM2.5 monitoring network that impact the location of a violating PM2.5 monitor. ⁴	58.10 (c)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	If the process for the review of changes to the PM2.5 network does not meet the req: withhold approval of that portion.	must	N	Y
Plan to modify the network that complies with findings of the 5-year network assessment. [Note: can be submitted on year of network assessment or year after.]	58.10 (e) 58.14 (a)	Only applies to year of or after 5-year network assessment	Add/correct in following year's plan and withhold approval of that portion	Yes if plan was submitted, either with ANP or separately	If the plan would result in not meeting other requirements then withhold approval of that portion.	Shall develop and implement. Final plan subject to approval by RA.	N	N

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⁴ The affected state or local agency must document the process for obtaining public comment and include any comments received through the public notification process within their submitted plan.

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All additions and discontinuations of SLAMS have been subject to approval according to 58.14	58.10 (e)		Withhold approval of that portion. Work separately with agency to obtain information needed to approve modification and approve outside ANP process. List in following year's plan.		If modification does not meet req: withhold approval of that portion.		Y for some sites: DV, high conc, co-located, etc.	Y
Data submitted to AQS	58.16		for ANP			No regulatory req. in 58.10 or App A, C, D, or E for this in ANP		
<u>Include information about SPMs including statement of purpose, evidence that 58.11, 58.12 and App A (or approved alternative) is met.</u>	<u>58.20</u>					<u>Must / shall</u>		
<u>IF SPM is an FEM, FRM or ARM data must be submitted to AQS (along with</u>	<u>58.20(b)</u>							

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Comment [m4]: This is not required to be in ANP and I don't know how we'd check so I suggest removing

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<u>whether it is meeting app A and E</u>								
<u>Start Date of FRM/FEM/ARM at SPM to determine 24 months and information that App A, C or E requirements were not met</u>	<u>58.20(c) – (e)</u>					<u>Need info to judge comparability to NAAQS</u>	<u>N</u>	<u>N</u>
Precision/Accuracy reports submitted to AQS	App. A		Add/correct in following year's plan.		N/A – req. met if correct info submitted	Must => WOE	N	N
Annual data certification submitted	App. A		Add/correct in following year's plan and withhold approval of that portion.		N/A – req. met if correct info submitted	Must => WOE	Y	Y
Frequency of flow rate verification for manual PM samplers audit	App A, 3.3.2		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	
Frequency of flow rate verification for automated PM analyzers audit	App A, 3.2.3		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N
Frequency of one-point flow rate verification for Pb samplers audit	App A, 3.3.4.1		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval	Must => WOE		

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					of that portion.			
Frequency of one-point QC check (gaseous)	App. A, 3.2.1		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE		
Date of last Annual Performance Evaluation (gaseous)	App. A, 3.2.2		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE		
Dates of last two semi-annual flow rate audits for PM monitors	App A 3.2.4 and 3.3.3		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE		
Dates of last two semi-annual flow rate audits for Pb monitors	App A 3.3.4.1		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE		
PM2.5 co-location			Add/correct in following year's plan and withhold approval of that portion.		If co-location does not meet requirement then withhold approval of that portion.	Must => WOE	Y	Y
PM10 co-location			Add/correct in following year's plan and withhold		If co-location does not meet requirement then withhold approval of that portion.	Must => WOE	Y	Y

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Comment [m5]: Is PM10 co-location required?

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			approval of that portion.					
Pb co-location	App. A 3.3.4.3		Add/correct in following year's plan and withhold approval of that portion.		If co-location does not meet requirement then withhold approval of that portion.	Must => WOE	Y	Y
PM10-2.5 co-location	App. A 3.3.6		Add/correct in following year's plan.		If co-location does not meet requirement then withhold approval of that portion.	Must => WOE	N	N
PM2.5 PEP audits	App. A (3.2.7)		Check EPA records.	EPA requirement	EPA adjusts schedule	EPA req.	Y	N
Pb PEP audits	App. A (3.3.4.4)		Check EPA records.	EPA requirement	EPA adjusts schedule	EPA req.	Y	N
NPAP audit	App. A (2.4)		Check EPA records.	EPA requirement	EPA adjusts schedule	EPA req.	Y	N
Instrument/monitoring method code for each monitor: is it reported properly? Is it reported correctly (i.e., appropriate method code for regulatory monitors)?	App. C		Add/correct in following year's plan and withhold approval of that portion.		N/A – req. met if correct info submitted	must	Y	Y
Optional request to have PM2.5 continuous instruments treated as non-FEMs and therefore not	Proposed rule and memo		Assume all FEM instruments are comparable		If the evidence to treat FEMs as non-FEMs is not compelling: withhold approval		Y	Y if request is included

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Comment [m6]: Need this ref.

Comment [m7]: Are any of these App. A requirements critical vs WOE?

Comment [kjh8]: I think we should leave this out until finalized

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comparable to NAAQS?			to NAAQS (see previous item)		of that portion and treat all FEMs as regulatory monitors			
Start date for each monitor	App. C		Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must	Y – info is needed for valid DV determ. but can be obtained from AQS	Y
Instrument monitor type for each monitor			Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted		Y – ID non-reg. monitors	Y
Monitoring objective for each instrument	App. D 1.1		Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must	N	Y
Site type for each instrument	App. D 1.1.1		Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted		N	Y
Instrument parameter			Add/correct	Yes if correct	N/A – req. met if		Y	Y

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code for each instrument			in following year's plan and withhold approval of that portion.	info was submitted	correct info submitted			
Instrument parameter occurrence code for each instrument			Add/correct in following year's plan.	Yes if correct info was submitted	N/A – req. met if correct info submitted		N	N
Sampling season	App. D	Including our approval or date of our approval?	Add/correct in following year's plan and withhold approval of that portion.		If sampling season does not meet requirements or a deviation has not been approved: withhold approval of that portion	must	Y	Y
Sampling schedule for PM2.5	58.12(d)		Add/correct in following year's plan and withhold approval of that portion.		If sampling schedule does not meet requirements or a deviation has not been approved: withhold approval of that portion	must	Y	Y
<ul style="list-style-type: none"> 1:3 (must at NCore and required reg background and reg transport sites) Waiver for 1:6 at required SLAMS if data is not 5-10% away from either NAAQS and not 1 or more exceedances for prev 3 years Daily if DV site and 5% of 24-hr NAAQS 								

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Comment [m9]: Needed for PM2.5? Maybe just change this to PM2.5 POC?

Comment [kjh10]: Is helpful for PM2.5 (and sometimes PM10?) as a tracking device – but I agree w/ N's

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<ul style="list-style-type: none"> Speciation at STN must be 1:3 								
Sampling schedule for PM10	58.12(e)		Add/correct in following year's plan and withhold approval of that portion.		If sampling schedule does not meet requirements or a deviation has not been approved: withhold approval of that portion	must	Y	Y
Sampling schedule for Pb	58.12(b)		Add/correct in following year's plan and withhold approval of that portion.		If sampling schedule does not meet requirements or a deviation has not been approved: withhold approval of that portion	Must collect at 1:6 unless waiver	Y	Y
Sampling schedule for PM10-2.5 <ul style="list-style-type: none"> 1:3 (must at NCore if no continuous PM10-2.5 FEMs) PM10-2.5 speciation at NCore must operate 1:3 	58.12(f)		Add/correct in following year's plan and withhold approval of that portion.		If sampling schedule does not meet requirements or a deviation has not been approved: withhold approval of that portion	Must collect at 1:6-3 unless waiver	N	Y
Minimum monitoring requirements ⁵ met for O3	App. D		Add/correct in following year's plan and		If minimum monitoring requirements are not met: withhold	must	Y	Y

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⁵ Describe what has to be included (i.e., MSA, population, etc.).

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			withhold approval of that portion.		approval of that portion			
Minimum monitoring requirements met for NO2	App. D		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
Minimum monitoring requirements met for SO2	App. D section 4.4		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
Reporting/collecting max 5 minute average per hour for SO2	58.12(g), 58.16(g)					No regulatory req. in 58.10 or App A, C, D, or E for this in ANP		
Minimum monitoring requirements met for CO	App. D		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
Minimum monitoring requirements met for Pb, including for Pb at NCore	App. D section 4.5; 58.13(a)		Add/correct in following year's plan and		If minimum monitoring requirements are not met: withhold	must	Y	Y

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Comment [m11]: This is not required to be in ANP and I don't know how we'd check so I suggest removing

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			withhold approval of that portion.		approval of that portion			
Minimum monitoring requirements met for PM2.5 • <u>SLAMS & NCore are min # per Table D5 unless approved by RA</u>	<u>App. D 4.7.1(a)</u>		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
<u>Network Design Criteria for PM2.5:</u> • <u>Must represent community-wide air quality; neighborhood or urban scale, can be micro or middle scale if RA determines they represent many such locations in the metropolitan area</u>	<u>App. D 4.7.1(b)</u>		<u>Add/correct in following year's plan and withhold approval of that portion.</u>		<u>If minimum monitoring requirements are not met: withhold approval of that portion</u>	<u>must</u>	<u>Y</u>	<u>Y</u>
<u>Is at least one site in a population-oriented area of expected maximum concentration</u>	<u>App. D 4.7.1(b)(1)</u>		<u>Add/correct in following year's plan and withhold approval of that portion.</u>		<u>If minimum monitoring requirements are not met: withhold approval of that portion</u>	<u>Is to be sited</u>	<u>Y</u>	<u>Y</u>
<u>If >1 SLAMS required, is there a site in an area</u>	<u>App. D 4.7.1(b)(2)</u>		<u>Add/correct in following</u>		<u>If minimum monitoring</u>	<u>Is to be sited</u>	<u>Y</u>	<u>Y</u>

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ANP requirement	Citation within 40 CFR 58	Was the info submitted? If yes, page #s	Action if info is missing or incorrect	Does it meet the req?	Action if req. is not met (assumes correct info submitted)	Notes (for now on req. but ultimately for review notes)	Informs network adeq?	Critical for ANP app? ¹
<u>of poor air quality</u>			<u>year's plan and withhold approval of that portion.</u>		<u>requirements are not met: withhold approval of that portion</u>			
<u>Is there a requirement in this paragraph?</u>	<u>App. D 4.7.1(b)(3)</u>							
<u>Do the listed scales make sense given the other site information provided?</u>	<u>App D 4.7.1(b)(3)(1)-(5)</u>							
<u>Continuous PM2.5 monitoring</u> <ul style="list-style-type: none"> <u># equal to half the required SLAMS (round up)</u> <u>If required, at least on collocated with a FRM/FRM/ARM</u> <u>Must use methods and QA/QC approved by EPA RA</u> 	<u>App D 4.7.2</u>					<u>must</u>	<u>Y</u>	<u>Y</u>
<u>Is there at least one regional background and one regional transport site in each state? (with EPA approved methodologies and QA/QC, can be non-FEMs)</u>	<u>App D 4.7.3</u>					<u>Must</u>	<u>Y</u>	<u>Y</u>

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<u>PM2.5 Chemical Speciation:</u> <ul style="list-style-type: none"> Continue operating sites designated as STN, including the right analyses and using approved methods 	<u>App D 4.7.4</u>					<u>Shall continue</u>		
<u>Spatial Averaging for comparison to Annual NAAQS</u> <ul style="list-style-type: none"> Are intended CMZs defined and meet criteria in 40 CFR 50 App N 	<u>App D 4.7.5</u>							
Minimum monitoring requirements met for PM10	App. D		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
Minimum monitoring requirements met for PM10-2.5 <u>mass and speciation</u>	<u>App D 4.8</u>		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	N	Y
Distance of site from nearest road	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
Traffic count of nearest	App. E		Add/correct		Suggest corrective	followed to the	N	N

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road			in following year's plan.		action.	maximum extent possible		
Groundcover	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
Probe height	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
Distance from supporting structure	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
Distance from obstructions on roof	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
Distance from obstructions not on roof	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
Distance from trees	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
Distance to furnace or incinerator flue	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
Distance between colocated monitors	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
Unrestricted airflow	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
Probe material (if applicable)	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N

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Residence time (if applicable)	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N

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Use a weight of evidence approach.

Based on the information that is in the Annual Network Plan, [EPA has determined that the Annual Network Plan meets the requirements listed in 40 CFR 58.10, except for ...]

Comment [m12]: Use R1 language for this.

Identify action if deficient (request for next-year's plan, disapprove portion, address issue and resubmit, etc.)

Identify which have to be met for network adequacy vs. ANP approval (if there is a difference) or just which inform network adequacy.